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August 21, 2015

VIA ECF

Hon. Andrew J. Peck, U.S.M.J.  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 20D  
New York, New York 10007

Re: Rio Tinto plc v. Vale S.A., et al., Civil Action No. 14-cv-3042 (RMB) (AJP) (S.D.N.Y.)

Dear Judge Peck:

As noted on the record at the August 19, 2015 conference, Defendant Vale objects to the proposed Letter of Request submitted by Plaintiff Rio Tinto (Dk. 325), the full contents of which Rio Tinto refused to share with Vale until immediately before filing its application to the Court, and reserves its rights, as permitted by Your Honor, to assert its objections in any proceedings in England, including, *inter alia*, on the bases that the requests are overbroad in scope and time period.

Sincerely,



Jonathan I. Blackman